



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

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Steve Faryan, On Scene Coordinator
U.S. Environmental Protection Agency
Emergency Response Branch Region 5
77 W. Jackson Blvd, SE-5J
Chicago, IL, 60604-3590

U.S.EPA Unilateral Administrative Order
Lockformer Company Lisle, IL.

Dear Mr. Faryan:

This is pursuant to our discussions on October 16, 2003 on the matter of Lockformer's proposal for a confirmation sampling plan for areas 1, 2 and the former degreaser area and as described in Clayton's technical memorandum dated October 16, 2003.

Paragraph 3 (f) of the UAO states:

"Implementing a Confirmation Sampling Plan to determine if appropriate clean-up standards have been met. The plan shall provide for sampling of soil, ground water, surface water, metal, and concrete floors, walls and roofing material "

Clayton's technical memorandum referenced the Lockformer Work Plan (LWP) dated September 20, 2002 and the USEPA's, approval thereof.

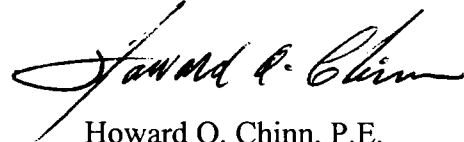
There exist a contract between the Lockformer Company and Thermal Remediation Services, Inc.(TRS) to conduct the remediation of those areas listed in the first paragraph above. TRS has a contractual obligation to remediate the areas to meet the Removal Action Objectives (RAOs) agreed to by the parties. Therefore, notwithstanding any previous agreements or approval, TRS is the appropriate party as the engineer, designer, installer and operator of the ERH system, it is incumbent upon them to provide us with a written certification when the remediate areas are ready for the soil confirmatory sampling. We should not be burden with the responsibility of making that determination and decision. This is consistent with the criteria

as stated in the Scope of Work under Clayton's technical memorandum of October 16, 2003.

We have a question on the use of zip-lock bags for the headspace screening (2nd full paragraph-page 4) due to the potential vapor transmission through the plastic bag.

We thank you for the opportunity to provide comments on the proposed confirmatory sampling plan by Lockformer.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Howard O. Chinn", written in a cursive style.

Howard O. Chinn, P.E.
Attorney General's Office
Environmental Bureau-N
188 W. Randolph St.
Chicago, IL 60601

cc: Stan Komperda, IEPA